

Jennifer M. Gaddis, OSB No. 071194

jgaddis@cityofsalem.net

City of Salem, Legal Department

555 Liberty St. SE, Room 225

Salem, Oregon 97301

Telephone: (503) 588-6003

Facsimile: (503) 361-2202

Attorney for City Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KEVIN BRATCHER,

Plaintiff,

v.

POLK COUNTY, CITY OF SALEM, DEPUTY
MICHAEL H. SMITH, in his individual
capacity, and DOES 1-2, in their individual
capacity,

Defendants.

Case No. 3:20-CV-02056-SB

**DECLARATION OF JENNIFER M.
GADDIS IN SUPPORT OF CITY
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Jennifer M. Gaddis, hereby declare under penalty of perjury that the following is true and correct:

1. I am the attorney representing the City Defendants in this matter. This Declaration is offered to present deposition transcript to the Court in support of City Defendants' Motion for Summary Judgment.

2. Attached to this Declaration and marked "Exhibit 1" are excerpts of the deposition testimony of plaintiff Kevin Bratcher, taken on behalf of City Defendants on September 30, 2021.

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I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: January 28, 2022.

s/Jennifer M. Gaddis

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